

1 PATRICK D. ROBBINS (CABN 152288)
2 Acting United States Attorney

3 MARTHA BOERSCH (CABN 126569)
4 Chief, Criminal Division

5 TAYLOR LORD (NJBN 379702022)
6 Special Assistant United States Attorney

7 60 South Market Street, Suite 1200
8 San Jose, California 95113
9 Telephone: (408) 535-5589
10 FAX: (408) 535-5066
11 Taylor.Lord@usdoj.gov

12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN JOSE DIVISION

16 UNITED STATES OF AMERICA,) CASE NO. **CR 25-70466-MAG**
17 Plaintiff,)
18 v.) NOTICE OF PROCEEDINGS ON OUT-OF-
19 KEANU JACKSON,) DISTRICT CRIMINAL CHARGES PURSUANT TO
20 Defendant.) RULES 5(c)(2) AND (3) OF THE FEDERAL
21) RULES OF CRIMINAL PROCEDURE
22 _____)

23 Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure
24 that on April 21, 2025, the above-named defendant was arrested pursuant to an arrest warrant (copy
25 attached) issued upon an

26 X Indictment

27 pending in the Southern District of Georgia, Case Number 2:24CR-10.

28 A copy of the indictment is attached.

29 Description of Charges:

30 Defendant KEANU JACKSON is charged via indictment with:

31 Count 1: 18 U.S.C. § 1349 Conspiracy to Commit Bank Fraud

32 Count 2: 18 U.S.C. § 1344 Bank Fraud

The maximum penalties are as follows:

Count 1:

- Maximum prison term of thirty (30) years
 - Maximum \$1,000,000 fine
 - Maximum supervised release term of five (5) years
 - \$100 special assessment

Count 2:

- Maximum prison term of thirty (30) years
 - Maximum \$1,000,000 fine
 - Maximum supervised release term of five (5) years
 - \$100 special assessment

Respectfully Submitted,

PATRICK D. ROBBINS
Acting UNITED STATES ATTORNEY

Date: April 21, 2025

/s/
TAYLOR LORD
Special Assistant United States Attorney

FILED
 John E. Triplett, Clerk of Court
 United States District Court
By jamesBurrell at 12:35 pm, Dec 04, 2024

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF GEORGIA
 BRUNSWICK DIVISION

UNITED STATES OF AMERICA) INDICTMENT NO.	2:24CR-10
v.)	
KEANU JACKSON) 18 U.S.C. § 1349	
) Conspiracy	
) 18 U.S.C. § 1344	
) Bank Fraud	

THE GRAND JURY CHARGES THAT:

COUNT ONE
Conspiracy to Commit Bank Fraud
 18 U.S.C. § 1349

1. Beginning at least in or about November 2022 and continuing thereafter until on or about the date of the Indictment, the exact date being unknown to the grand jury, in Camden County, within the Southern District of Georgia and elsewhere, the Defendant,

KEANU JACKSON,

with A.H. and other co-conspirators, known and unknown, did conspire, confederate, and agree with each other to commit bank fraud, that is, to knowingly execute or attempt to execute a scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property under the custody and control of a financial institution by means of false and fraudulent pretenses, representations, and promises, all in violation of Title 18, Section 1344 of the United States Code.

Object of the Conspiracy

2. It was the object of the conspiracy for KEANU JACKSON, A.H., and others to unlawfully enrich themselves by, among other things, cashing and

depositing fraudulent checks.

Manner and Means of the Conspiracy

3. It was part of the conspiracy, and the manner and means hereof, that **KEANU JACKSON** would obtain checks made payable to someone other than **KEANU JACKSON**, and then provide those checks with the name of the payee altered to individuals known to **KEANU JACKSON**, including A.H.

4. With the altered check that identified individuals known to **KEANU JACKSON** as the payee, the individuals would then negotiate the checks at a financial institution and deposit the funds into their accounts.

Overt Acts

5. As part of the conspiracy, on or about November 1, 2022, **KEANU JACKSON** obtained a check issued by Company 1 in the amount of \$72,523.06.

6. Company 1 did not list **KEANU JACKSON** or A.H. as the payee on the check.

7. **KEANU JACKSON** provided the check to A.H. with A.H. as the payee.

8. A.H. agreed to deposit the altered check into A.H.'s bank account.

9. On or about November 7, 2022, A.H. negotiated the altered check at Financial Institution 1, the deposits of which were then insured by the National Credit Union Share Insurance Fund, located at Kings Bay, within the Southern District of Georgia, and deposited the funds into A.H.'s account with Financial Institution 1.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO

Bank Fraud

18 U.S.C. § 1344 and § 2

10. Paragraphs 1 through 9 of the Indictment are incorporated by reference as if fully set forth herein.

11. On or about November 7, 2022, in Kings Bay, Georgia, within the Southern District of Georgia and elsewhere, the Defendant,

KEANU JACKSON,

aided and abetted by A.H. and others known and unknown to the Grand Jury, did knowingly execute a scheme and artifice to defraud, and obtain money and property, owned by, or under the custody or control of, Financial Institution 1, the deposits of which were then insured by the National Credit Union Share Insurance Fund, by means of materially false and fraudulent pretenses, representations, and promises.

The Scheme and Artifice

12. It was part of the scheme and artifice that members of the conspiracy would obtain checks payable to someone other than the members of the conspiracy and then provide those checks with the payee altered to members of the conspiracy.

13. It was further part of the scheme and artifice that members of the conspiracy would then negotiate those checks at a financial institution.

14. On or about November 7, 2022, within the Southern District of Georgia, KEANU JACKSON, aided and abetted by A.H., for the purpose of executing the scheme described above, and attempting to do so, knowingly presented the following forged and fraudulent check to be cashed or for deposit into various bank accounts and aided and abetted others in doing so:

Approximate Date	Fraudulent Check
November 7, 2022	Check # 48275 for \$72,523.06 drawn on account of Company 1 from Financial Institution 2 made out to A.H. and deposited into Financial Institution 1 account in the name of A.H.

All in violation of Title 18, United States Code, Sections 1344(2) and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and Title 28, United States Code, Section 2461(c).

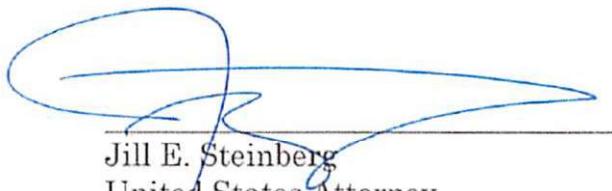
Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1344 and 1349 set forth in Counts One and Two of this Indictment, Defendant **KEANU JACKSON** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(A) and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation.

If any of the property described above, as a result of any act or commission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill



Jill E. Steinberg
United States Attorney



Ryan C. Grover
Assistant United States Attorney
*Lead Counsel



Tania D. Groover
Assistant United States Attorney
Chief, Criminal Division

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America

v.

KEANU JACKSON

Defendant

RECEIVED
U.S. Marshals Service
Savannah, Georgia
DEC 05 2024

2521-1205-DIALE-J
Case No. 2:24CR-10
FILED 11744364

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) KEANU JACKSON,
 who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 CONSPIRACY TO COMMIT BANK FRAUD

Date: 12/05/2024

JOHN E. TRIPLETT, CLERK OF COURT

Printed name and title

A handwritten signature in black ink, appearing to read "John E. Triplett".

City and state: SAVANNAH, GEORGIA

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title